



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Number : 10/726,624 Confirmation No.: 5743
Applicant : Ali Alavi
Filed : December 4, 2003
Title : HTML/DHTML Web Interface System and Method
TC/Art Unit : 2165
Examiner: : Yican Wu

Docket No. : 53470.003060
Customer No. : **21967**

REPLY BRIEF

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In response to the Examiner's Answer of February 23, 2006 appellant respectfully requests that the Board of Patent Appeals and Interferences reconsider and withdraw the rejections of record, and allow the pending claims.

53470.003060

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I. Status of Claims

Claims 1-20 are pending in this application. All of these claims are currently rejected.

The rejection of claims 1-20 is appealed.

II. Grounds of Rejection to be Reviewed on Appeal

The following grounds of rejection are to be reviewed on appeal:

- 1) The rejection under 35 U.S.C. § 103(a) of claims 1-20 based on Thompson in view of Brooke.

III. Argument

The Examiner's Answer continues to repeat an essential error in this case. The examiner alleges that the primary reference, U.S. Patent No. 6,668,253 to Thompson et al. ("Thompson"), teaches every limitation of the independent claims, with the exception of internationalization tools. (Examiner's Answer Page 13). The Examiner's Answer alleges that Col. 30, lines 59- col. 31 line 4 and col. 60, lines 60-67 teaches that tools are located on the web server. Appellant respectfully disagrees. The cited lines merely state that the reference requires a web server. The lines preceding the cited ones state "the application functionality is delivered through the PC's web browser." (col. 30, lines 46-47). "EIM's present embodiments operate on browsers with support for Active X controls and Visual Basic Scripting." (col. 30, lines 49-51) In contrast, the specification of the pending application discloses: "The web server 306 handles the navigation and appearance of all pages quickly and efficiently, eliminating the need for having navigation tools on the client device 302 within the client browser." (Page 16, lines 16-18). Claims 1 and 14 recite "navigation tools" and "internationalization tools" that are "located on [a] web server." Claims 2-13 and 15-20 depend from claims 1 and 14 and thereby incorporate this feature by reference. Thompson fails to teach or suggest this feature. The Examiner's Answer concedes that Thompson fails to teach "internationalization tools," but it asserts that the "navigation tools" are taught by Figure 2 of Thompson. (Page 4) Figure 2 and its corresponding description in the specification are silent in regard to the "location" of any tools. The reference in Examiner's Answer to "ASP pages generate the DHTML necessary for the EIM application" (Page 13), overlooks the context in the reference stating "any processing not taking place on the client's personal computer takes place on the web server" (col. 30, lines 66-67). As cited above "The EIM application runs on personal computers ..application functionality is delivered through the

PC's web browser ... EIM's present embodiments operate on browsers.." (col. 30, lines 44-51)

Neither the cited passage nor Figure 2 explicitly disclose "navigation tools" that are "located on [a] web server" as recited by the claims. Nor is this recitation inherently disclosed, because it is not typical for navigation tools to be stored on a web server in this context.

Brooke is directed to an "XML Server Pages Language" and does not remedy the deficiencies of Thompson. Thus, the combination of Thompson and Brooke does not teach or suggest claims 1-20.

The Examiner's Answer does not specifically identify navigation tools or their location in either reference. The Office fails to identify where in Brooke or in Thompson that a teaching regarding the location of the navigational tools is made. The Office never addresses the location issue and thus, have failed to provide a *prima facie* case of obviousness.

In view of the foregoing, the § 103(a) rejections of claims 1-20 cannot stand.

IV. Conclusion

In view of the foregoing, appellant respectfully requests that the Board reverse the prior art rejections set forth in the Action, and allow all of the pending claims.

Respectfully submitted,

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